

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FP/78/25/DOC	Reviewer Reference:	ADC/EXT4
Planning Officer:	Amber Willard	Date of Review:	17/11/2025
Site Name:	1 Burley Road Felpham PO22 7NF		
Application Description:	Approval of details reserved by condition imposed under reference FP/176/24/PL relating to condition number 3 -surface water drainage scheme , condition number 4 - acoustic, condition number 5 - Biodiversity Enhancement Layout and condition number 6 - schedule of materials and finishes.		
Assessment Number:	2 of 2		

Policy and Guidance Information	
Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater Land Drainage Consent – https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/ Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/ Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds The SuDs Manual [C753] by CIRIA	

Response	Condition 3: Objection
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References
The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to 'Sustainable drainage systems: non-statutory technical standards' [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development. The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025. This consultation has been primarily informed by the NSfS and The SuDS Manual.

Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our surface water drainage design checklist (linked above). A failure to address these will result in an **objection** to any application to discharge a surface water drainage design condition.

If any of these items are inadequately addressed by the submission, then their correction may result in a redesign of the surface water drainage scheme. A redesign is likely to have site wide implications such as the potential for storage structures to increase in volume or plan area, or the provision of other important infrastructure to satisfy the NSfS set out below.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to land.drainage@arun.gov.uk if needed.

Standard	Assessment	Response
1. Runoff destination	Insufficient	Objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- Location Plan E-001
- 1111-2528 CIV 10 Drainage Layout p3
- Drainage construction details sheet 1 of 2 1111-2528-CIV-50-P1
- Drainage construction details sheet 2 of 2 111-2528-CIV-51-P1
- Groundwater monitoring results Rev A
- 1111-2528 B 100 year 45% CC
- 1111-2528 B 30 year 40% CC
- 1111-2528-B 10 year storm network flow data
- Storm Network Flow Data FEH-22 - (Causeway - 1111-2528-A.pfd)
- Storm Network Flow Data FEH-22 - (Causeway - 1111-2528-A.pfd)
- Drainage Layout 1111-2528-CIV-10 RevP2
- Drainage Construction Details Sheet 1 of 2 - 1111-2528-CIV-50 RevP1
- Drainage Construction Details Sheet 1 of 2 - 1111-2528-CIV-51 RevP1

Condition wording

Condition 3 is worded as follows:

"No development apart from demolition of the existing buildings shall commence, until full details of the proposed surface water drainage scheme is submitted to, and approved in writing by the local planning authority. The full details submitted for approval shall include:

- 1. Winter groundwater monitoring,*
- 2. Winter infiltration testing strictly in accordance with BRE DG 365 or similar approved,*
- 3. Details of the proposed method and location of surface water disposal, in accordance with the SuDS hierarchy,*
- 4. Impermeable area plan,*
- 5. Calculations modelling the surface water drainage network for the following storm events:*
 - a. 100% Annual Exceedance Probability*
 - b. 10% AEP + climate change allowance*
 - c. 3.3% AEP + climate change allowance*
 - d. 1% AEP + climate change allowance*
- All storm events must include an allowance for urban creep and surcharged outfalls where appropriate,*
- 6. Detailed drainage plans conforming to Local Planning Authority guidance,*
- 7. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,*
- 8. Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme. The scheme shall then be constructed as per the approved plans. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority.*

Reason: In order to comply with Arun Local Plan policies W DM2 and W DM3 and the NPPF. It is considered necessary for this to be a pre-commencement condition as the site lies in a defined Lidsey Local Flood Risk Zone and it is important to ensure that the drainage scheme is agreed before construction commences."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. The infiltration testing and groundwater monitoring provided is inconclusive and as such does not provide sufficient evidence that the site can be drained via infiltration. Without this there is a risk that the surface water drainage could increase the risk of flooding both on and offsite.

Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- ☐ Landscaping officer (proposed trees and landscaping)
- ☐ Tree officer (existing trees)
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☐ Lead local flood authority (all other sources of flooding and ordinary watercourses)
- ☐ Other: Specify
- ☐ None

Application Reference: FP/78/25/DOC Site Name: 1 Burley Road Felpham PO22 7NF	Initial Issue Date: 17/11/2025 Issue Date: 17/11/25 Reviewer Reference: ADC/EXT4
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Summary and Recommendation:

Condition 3: **Objection**

Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.

	ADC Drainage Comments	Designer Response	ADC Drainage Comments		
Date:	4/09/25	16/09/25	14/11/2025		
Condition Number:					
Comment Number					
1.	Please provide Winter Groundwater monitoring results as well as winter infiltration test results to BRE365 to support the use of the soakaway on the site	Infiltration results attached	Please provide a plan, details of the infiltration testing carried out. Appears that six sets of results have been provided but its not clear if these were carried out in multiple locations or whether 6no. tests were completed in the same trial pit? In addition it appears that in all cases the tests were not completed to fully emptying. We would refer the designer to the requirements of BRE365 which is a measure of the rate from 25% to 75% of full emptying. The current information provided does not appear to adhere to compliant BRE 365 testing.		

			In addition infiltration tests at the proposed formation level of the permeable paving should be carried out to confirm the design criteria for this pavement. Please provide a plan on the locations of the Ground water monitoring wells. In addition to this The groundwater monitoring appears to have been carried out only to the base of the infiltration test pits. The investigations for monitoring should be extended to at least 1m below the base of the proposed soakaway to ensure that the minimum 1m freeboard is achieved.		
2.	Please review calculations to use the correct climate change allowance of 45% for the 100 year return period and 40% for the 30 year return period	Attached	Updated infiltration testing compliant to BRE365 and ADC requirements is needed to be reflected in the calculations.		
3.	Please update calculations with a CV of 1	Amended			
4.	Please provide an exceedance flow layout	Flow arrows shown on drawing 10	The flow arrows don't appear to be following the proposed topography. From the plan it appears the exceedance flow routes are proposed to travel uphill to the existing road. Please		

			review and if required provide additional proposed onsite design level information		
5.	Please provide an impermeable areas plan	Areas shown on drawing 10	Noted thank you		
6.	Please provide a construction detail for the soakaway which is specific for the proposal being proposed for the site. The current detail provided is generic.	Attached	It appears the same generic SDS Geolight detail has been provided in the resubmission. This does not appear site specific or does it match what has been designed on the drainage layout drawing. Please provide a site specific detail		

If a designer would like a .docx version of this document to aid administration of responses, please request this by email to land.drainage@arun.gov.uk.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
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<https://www1.arun.gov.uk/planning-application-finder>



Our priorities...

 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 17 November 2025 15:28
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: FP/78/25/DOC

Please find enclosed our external consultants response, an objection.

Regards

Paul Cann

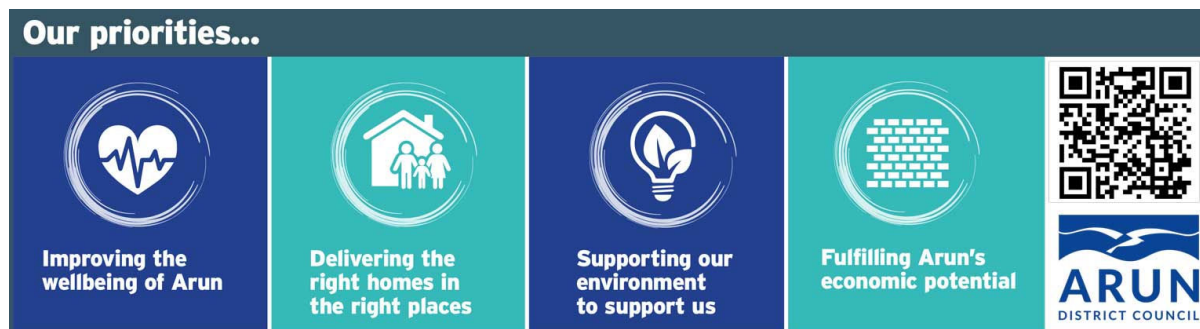
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: Tuesday, September 16, 2025 3:38:52 PM (UTC+00:00) Monrovia, Reykjavik

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Re-Consultation on: FP/78/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: FP/78/25/DOC

Registered: 12th June 2025

Site Address: 1 Burley Road Felpham PO22 7NF

Grid Reference: 496613 99712

Category: Discharge of Condi

Description of Works: Approval of details reserved by condition imposed under reference FP/176/24/PL relating to condition number 3 -surface water drainage scheme, condition number 4 - acoustic, condition number 5 - Biodiversity Enhancement Layout and condition number 6 - schedule of materials and finishes.

I am able to inform you that I have received an amendment to the above application dated 16th September 2025 relating to: Additional and substitute drainage information

If you should wish to make further representations as a result of this amendment, please make any further comment by **30th September 2025**.

[Click here to view the application, documents and make further comments](#)

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Yours sincerely

Amber Willard

Planning Case Officer-Arun District Council

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Email: amber.willard@arun.gov.uk

PLRECON_DOC (ODB) 2020